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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	Case No.: 2:14-cr-00265-JCM-VCF
)	
Plaintiff,)	<u>STIPULATION TO CONTINUE</u>
)	<u>SENTENCING</u>
vs.)	(Second Request)
)	
RYAN PATRICK MOSKOWITZ,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Lisa C. Cartier Giroux, Assistant United States Attorney, counsel for the United States of America, and Michael Pandullo, counsel for Ryan Moskowitz, that the sentencing hearing currently scheduled for Tuesday, December 8, 2015 at the hour of 10:30 a.m., be vacated and be continued to a date and time convenient to the Court, but no sooner than thirty (30) days from December 8, 2015.

The request for a continuance is based upon the following:

1. The additional time requested by this Stipulation to Continue Sentencing Hearing is reasonable pursuant to Fed.R.Crim.P. Rule 32(b)(2), which states that the “court may, for good cause, change any time limits prescribed in this rule.”

2. The parties have been preparing for sentencing, and need additional time to

gather further information pertinent to sentencing factors under 18 U.S.C. Section 3553(a).

3. The defendant is incarcerated, and does not object to the continuance.

4. The parties agree to the continuance.

5. The parties request that Ryan Patrick Moskowitz's sentencing date be reset no sooner than thirty (30) days from December 8, 2015.

6. The additional time requested by this Stipulation is made in good faith and not for purposes of delay.

7. Additionally, denial of this request for continuance could result in a miscarriage of justice.

8. This is the second requested continuance of the sentencing by the parties in this case.

DATED this 1st day of December, 2015.

By: /s/ Lisa C. Cartier Giroux
LISA C. CARTIER GIROUX
Assistant United States Attorney

By: /s/ Michael Pandullo
MICHAEL PANDULLO, ESQ.
Counsel for Ryan Patrick Moskowitz

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RYAN PATRICK MOSKOWTIZ,

Defendant.

Case No.:2:14-cr-00265-JCM-VCF

FINDINGS OF FACT, CONCLUSIONS OF
LAW AND ORDER

(Second Request)

FINDINGS OF FACTS

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The additional time requested by this Stipulation to Continue Sentencing Hearing is reasonable pursuant to Fed.R.Crim.P. Rule 32(b)(2), which states that the “court may, for good cause, change any time limits prescribed in this rule.”

2. The parties have been preparing for sentencing, and need additional time to gather further information pertinent to sentencing factors under 18 U.S.C. Section 3553(a).

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